

Message

From: Susan Schow [schow29@comcast.net]
Sent: 11/28/2017 3:39:51 PM
To: kaylie.holland@alaska.gov; escheehl@arb.ca.gov; Beeler, Cindy [Beeler.Cindy@epa.gov]; roopa.ganapathy@canada.ca; james.jarrett [james.f.jarrett@wv.gov]; placey@aga.org; mmurphy262@comcast.net; sanjay.shah@dep.nj.gov; kevin.speicher@dps.ny.gov; timakirataylor@live.com [timothy.taylor@state.co.us]
CC: 'Dorman, Lisa' [ldorman@pa.gov]
Subject: Regulations Section - METHANE Tech Reg Doc
Attachments: Methane Tech-Reg Regulations Appendix_10_26_17_Tim_Edits.docx

Importance: High

Methane Regulations Section Members,

We still need two key efforts to complete the Regs Section for the External Draft document:

- Review and finalize the current Regs text section in the main body of the document (only a few pages but still has yellow editing and question marks) and,
- Review and finalize the Regs-Appendix text section which still has many comments and editing notations. Attached is the current version of the Appendix.

How should we go about finalizing? Can anyone volunteer to help with above?

We are currently confirming some state regs (see below) for the main text and we also need to add language of the new Utah Regs in the article recently circulated.

I also suggest we also schedule a Section Call to discuss and agree upon final plan for edits.

What dates work best? I have proposed a few for next week in the Doodle Poll at link below (also let me know the times that work best).

<https://doodle.com/poll/f3592wsbhndt3etz>

We are close now – let's keep pushing to get this finalized as close to the Dec 8th date as we can. We will send to Federal Agencies for review in January!

Thanks,
Susan

Susan Schow, MPH
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207-841-0534

From: Susan Schow [mailto:schow29@comcast.net]
Sent: Monday, November 27, 2017 3:47 PM
To: 'Bhatt, Naishadh' <nabhhatt@pa.gov>
Cc: 'Dorman, Lisa' <ldorman@pa.gov>; 'Taylor - CDPHE, Timothy' <timothy.taylor@state.co.us>; 'Scheehle,' <elizabeth.scheehle@arb.ca.gov>
Subject: RE: Regulations Section of the METHANE Internal Draft
Importance: High

Hi Nash,

I have inserted your changes/edits to Pennsylvania in **Table 1 – LDAR Regulations by Government** at the bottom of page 10 in the attached Regulations Section document. Can you confirm I have edited correctly?

[Note: the attached document is an abbreviated version of the entire document and only for confirming your changes].

Can you also check the row for "General Permit 5 & Permit Exemption #38 (State, Pennsylvania DEP)" in **Table 2 – Applicable Fugitive Emission/Leak Detection Regulations by Segment (Oil & Natural Gas Supply Chain)** on page 12? Just want to confirm this is also accurate for PA.

Can you also confirm the text in the Regulations - Appendix for Pennsylvania is correct (pasted below)? Please edit and return if necessary.

2.2.2 Pennsylvania – General Permit 5 and Permit-Exemption Category No. 38

Pennsylvania's General Permit 5 (GP-5) is a General Plan Approval and/or General Operating Permit for midstream natural gas gathering, compression and/or processing facilities that are that are classified as minor sources of air pollution.

GP-5 was first approved by the Pennsylvania Department of Environmental Protection (DEP) on February 1, 2013. (http://www.dep.state.pa.us/dep/deputate/airwaste/aq/permits/gp/GP-5_2-25-2013.pdf) An owner or operator of a facility subject to GP-5 must conduct monthly leak monitoring at the facility on a monthly basis using AVO methods and on a quarterly basis using an OGI camera or other leak detection monitoring device approved by the DEP. A leak is defined as any release of gaseous hydrocarbons detected by the OGI camera or through AVO methods.

Permit-exemption category no. 38 (PE #38) was finalized on August 10, 2013 and applies to unconventional wells, wellheads, and associated equipment and requires an LDAR program within 60 days after a well is put into production, and annually thereafter, as a condition of meeting the permit-exemption. The LDAR program must utilize an OGI camera or a gas leak detector capable of reading methane concentrations in air of 0% to 5% with an accuracy of +/- 0.2%, or other leak detection monitoring devices approved by the DEP. LDAR must be conducted on valves, flanges, connectors, storage vessels/storage tanks, and compressor seals in natural gas or hydrocarbon liquid service.

As of the date of this document, DEP has not published any guidance on the application and evaluation procedures for "other leak monitoring devices" to gain approval for use under GP-5 and PE #38. A Frequently Asked Questions (FAQ) document published by DEP for GP-5 and PE #38 states that an alternate leak detection technology could be used if "it is approved by DEP following a case-by-case evaluation of the device or technology."

(http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Permits/gp/FAQ_GP-5_AND_EXEMPTION_CATEGORY_NO_38.pdf)

As of the date of this document, no requests for approval of alternate leak detection technologies or methods had been submitted to the DEP.

Once I have your confirmation or edits, I will incorporate into the current full version of the draft document and request additional edits to the Regs section be completed by other Reg Section members.

Thanks,
Susan

Susan Schow, MPH
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207-841-0534

From: Bhatt, Naishadh [<mailto:nabhath@pa.gov>]

Sent: Tuesday, November 14, 2017 2:33 PM

To: Susan Schow <schow29@comcast.net>

Cc: Dorman, Lisa <ldorman@pa.gov>; Taylor - CDPHE, Timothy <timothya.taylor@state.co.us>

Subject: RE: Regulations Section of the METHANE_Internal_Draft_10_03_17_Salt_Lake_City_Version

Please see my edits (highlighted in blue) in table for Pennsylvania requirements.

Thanks.

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